

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Billy Boy Real Estate, LLC, Billy Boy Construction, LLC,
and Eddie Hendrick

(b) County of Residence of First Listed Plaintiff Montgomery
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Law Offices of Robert T Vance Jr, 123 South Broad
Street, 15th Floor, Philadelphia PA 19109 267-887-0172

DEFENDANTS

Upper Merion Township, Upper Merion Township Board of
Supervisors, Tina Garzillo, Chairperson, William Jenaway,

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☒ 3 Federal Question
(U.S. Government Not a Party)
☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 USC Section 1983

Brief description of cause:

Race discrimination, Equal Protection Clause and Due Process Clause violations

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE n/a

DOCKET NUMBER

DATE

October 20, 2024

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

Place of Accident, Incident, or Transaction: King of Prussia PA

RELATED CASE IF ANY: Case Number: N/A Judge: _____

- | | |
|---|------------------------------|
| 1. Does this case involve property included in an earlier numbered suit? | Yes <input type="checkbox"/> |
| 2. Does this case involve a transaction or occurrence which was the subject of an earlier numbered suit? | Yes <input type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent which was the subject of an earlier numbered suit? | Yes <input type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus petition, social security appeal, or pro se case filed by the same individual? | Yes <input type="checkbox"/> |
| 5. Is this case related to an earlier numbered suit even though none of the above categories apply?
If yes, attach an explanation. | Yes <input type="checkbox"/> |

I certify that, to the best of my knowledge and belief, the within case ☐ is / ☒ is not related to any pending or previously terminated action in this court.

Civil Litigation Categories

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☐ 8. Employment
- ☐ 9. Labor-Management Relations
- ☒ 10. Civil Rights
- ☐ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. Cases Seeking Systemic Relief ***see certification below***
- ☐ 16. All Other Federal Question Cases. (Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): _____
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: (Please specify) _____

I certify that, to the best of my knowledge and belief, that the remedy sought in this case ☐ does / ☒ does not have implications beyond the parties before the court and ☐ does / ☒ does not seek to bar or mandate statewide or nationwide enforcement of a state or federal law including a rule, regulation, policy, or order of the executive branch or a state or federal agency, whether by declaratory judgment and/or any form of injunctive relief.

ARBITRATION CERTIFICATION (CHECK ONLY ONE BOX BELOW)

I certify that, to the best of my knowledge and belief:

☒ Pursuant to Local Civil Rule 53.2(3), this case is not eligible for arbitration either because (1) it seeks relief other than money damages; (2) the money damages sought are in excess of \$150,000 exclusive of interest and costs; (3) it is a social security case, includes a prisoner as a party, or alleges a violation of a right secured by the U.S. Constitution, or (4) jurisdiction is based in whole or in part on 28 U.S.C. § 1343.

☒ None of the restrictions in Local Civil Rule 53.2 apply and this case is eligible for arbitration.

NOTE: A trial de novo will be by jury only if there has been compliance with F.R.C.P. 38.

United States District Court for the Eastern District of Pennsylvania

Billy Boy Real Estate, LLC, Billy Boy
Construction, LLC, and Eddie Hendrick

v.

Civil Action No.

Upper Merion Township,
Upper Merion Township Board of
Supervisors, Tina Garzillo, Chairperson,
William Jenaway, Ph.D., Vice
Chairperson, Greg Waks, Greg Philips,
Carole Kenney, and Anthony Hamaday,
Upper Merion Township Manager

Jury Trial Demanded

Complaint

Plaintiffs, Billy Boy Real Estate, LLC, Billy Boy Construction, LLC, and Eddie
Hendrick, bring a series of claims against the Defendants, of which the following is a statement:

1. This lawsuit is another chapter in the sad history of government discrimination
against Black landowners. As described herein, defendants violated the Plaintiffs' rights under
the Equal Protection and Due Process Clauses of the Fourteenth Amendment to the U.S.
Constitution and unjustly interfered with their contract.

Jurisdiction and Venue

2. The Court has jurisdiction over this case pursuant to 28 U.S.C. §§ 1331 and 1343
and 42 U.S.C. §1983. This Court may exercise supplemental jurisdiction over the state law
claims pursuant to 28 U.S.C. § 1367.

3. Venue is appropriate in this judicial district under 28 U.S.C. § 1391(b).

Parties

4. Plaintiff Billy Boy Real Estate, LLC, is a limited liability company organized
pursuant to the laws of the Commonwealth of Pennsylvania, as is Plaintiff Billy Boy
Construction, LLC (hereafter collectively referred to as "Billy Boy"). Billy Boy is a certified

Minority Business Enterprise (MBE). Its principal place of business is located at 216 Allendale Road, King of Prussia, Pennsylvania 19406.

5. Plaintiff Eddie Hendrick is an African American male citizen of the United States and a resident of this judicial district. He is the sole shareholder and President of Billy Boy Real Estate, LLC and Billy Boy Contracting, LLC.

6. Defendant Upper Merion Township (the “Township”) is a second-class township in Montgomery County, Pennsylvania. Defendant Upper Merion Township Board of Supervisors (the “Board”) is the governing body of Upper Merion Township and is comprised of five (5) elected members. At all times relevant to this case, the members of the Board were Tina Garzillo, Chairperson, William Jenaway, Ph.D., Vice Chairperson, Greg Waks, Greg Philips, and Carole Kenney. Defendant Anthony Hamaday is the Township’s Manager.

7. The acts set forth in this Complaint were authorized, ordered, condoned, ratified and/or done by defendants’ officers, agents, employees and/or representatives while actively engaged in the management of the Township’s business and pursuant to the Township’s official policies, practices, and customs.

8. The individual defendants are sued in their individual and official capacities.

Background Facts

9. Sometime prior to 2023, Billy Boy and Louis A. Damiani entered into an Agreement of Sale pursuant to which Billy Boy agreed to purchase from Damiani the approximately 1.13-acre parcel located at 216 Allendale Road, King of Prussia (the “Property”), for the purchase price of \$1,500,000.00. A true and correct copy of the Agreement of Sale is attached hereto as Exhibit A and made a part hereof.

10. At the time of entering into the Agreement of Sale, Billy Boy and Hendrick were occupying a portion of the Property as living quarters and operating a business

11. Through April 5, 2024, Plaintiffs made payments of \$665,940.00 towards the purchase price and spent over \$200,000.00 in making improvements to the Property.

12. Sometime prior to March 2024, the Township learned that Mr. Damiani had agreed to sell the Property to Billy Boy.

13. Defendant Hamady called Mr. Damiani on numerous occasions and asked Mr. Damiani if he wanted to sell the Property to the Township. On each occasion, Mr. Damiani told Mr. Hamady that he had an agreement with Billy Boy and Mr. Hendrick to sell the Property to them, and that Mr. Hamady should direct his inquiries to Mr. Hendrick. Mr. Hendrick refused to sell the Property to the Township.

14. As a consequence, on March 22, 2024, motivated by racism and racial animus, defendants implemented and acted in furtherance of a plan, scheme and design to acquire ownership of the Property by filing of record in the Court of Common Pleas of Montgomery County, Pennsylvania, a Declaration of Taking, thereby condemning the Property as of that date. A true and correct copy of the Declaration of Taking is attached hereto as Exhibit B and made a part hereof.

15. In the Declaration of Taking, the Township alleged it condemned the Property for the recreational use and benefit of the public. However, in the Declaration of Taking, the Township failed to state how annexing the Property to its existing real estate would benefit the public, what recreational purposes the Property would be used for, what improvements would be performed on the Property, or when the improvements or the recreational use would commence on the Property.

16. In truth, however, the filing of the Declaration of Taking was a pretext for the Township's actual improper and unlawful racial motivations for filing the Declaration of Taking for the Property. The true purpose of filing of the Declaration of Taking was to exclude a legitimate and successful Black-owned business from the predominantly White Township.

17. There was no rational need for the Township to take the Property for recreational purposes. There is a large amount of real estate owned by the Township adjacent to the Property that is presently wooded and not being used by the Township for recreational purposes that could be used for such purposes. The Property is a heavy industrial, non-conforming, pre-existing use where construction contractors, all White-owned businesses, operated from the early 1950s until January 2023. The White-owned businesses operated on the Property with the storage of large trucks and a large garage facility for the repair of large industrial equipment, which were out of view to the public. The Pennsylvania Turnpike was constructed adjacent to the Property in the 1950s.

18. In January 2023, Billy Boy began storing its vehicles on the Property and operating its business from the Property. The Property is due to be transferred shortly.

19. The Township is predominantly White, particularly in the area where the Property is located. The individual defendants and other Township employees, including the Township Building Inspector, were aware that the operator of a MBE had entered into an Agreement of Sale for the Property and had begun operating its business on the Property beginning in January 2023.

20. The parcels of real estate owned by the Township adjacent to the Property are separated by a creek and wooded area. The Township-owned properties have existed for several decades, during which time a White-owned construction company was operated on the Property

and no declaration of taking had been filed. There is no practical difference between the operation of the White-owned construction businesses on the Property for the last sixty (60) years and the operation of Billy Boy's business. The only difference is the race of Billy Boy's employees and owner, facts which make clear that defendants' filing of the Declaration of Taking was motivated by race and racial animus.

21. On March 21, 2024, the Township's all-White Board of Supervisors met held an executive session with its White Solicitor during which they decided to file the Declaration of Taking for the Property. This decision was motivated by race discrimination and racial animus.

22. There was no discussion of the proposed taking of the Property during the public session of the Board of Supervisors meeting on March 21, 2024, only a unanimous vote by the Board of Supervisors to take the Property, and thereby force Billy Boy, a MBE, out of its present location.

23. There was no notice given to Mr. Damiani, Billy Boy, the equitable owner, of the public, that the Board of Supervisors would be considering a resolution to effectuate the Declaration of Taking of the Property at the March 21, 2024 Board of Supervisors meeting. The public portion of the meeting was limited to the vote of the Board of Supervisors, with no public comment or meaningful discussion made in public, and lasted for less than sixty (60) seconds.

24. The actions and omissions of defendants in relation to the March 21, 2024 Board of Supervisors meeting and the filing of the Declaration of Taking violated 65 Pa.C.S. § 704, the Pennsylvania Sunshine Act, and Billy Boy's rights as the equitable owner under the Pennsylvania and United States Constitutions.

25. On April 25, 2024, Billy Boy and Mr. Hendrick filed a Petition to Intervene in the Montgomery County Condemnation Proceedings.

26. On April 29, 2024, Mr. Damiani filed Preliminary Objections to the Declaration of Taking in the Montgomery County Condemnation Proceedings.

27. On June 26, 2024, the Montgomery County Court of Common Pleas granted Billy Boy and Mr. Hendrick's Petition to Intervene in the Montgomery County Condemnation Proceedings.

28. On September 11, 2024, Honorable Steven C. Tolliver of the Montgomery County Court of Common Pleas held a hearing in the Montgomery County Condemnation Proceedings on Mr. Damiani's Preliminary Objections to the Declaration of Taking. To date, Judge Tolliver has not ruled on Mr. Damiani's Preliminary Objections.

29. As a direct and proximate result of defendants' actions described above, Billy Boy and Mr. Hendrick lost revenues and incurred unnecessary costs and delays.

30. The actions of the defendants described above were the decisions of Township lawmakers.

31. The individual defendants were policymaking officials with respect to the actions described above.

32. The defendants' actions and practices were so persistent and widespread that they had the force of law.

33. The individual defendants had policymaking authority with respect to the actions described above, rendering their behavior acts of official government policy.

Count I – Equal Protection Clause violation

34. Plaintiffs incorporate herein by reference as if set forth in full the allegations of paragraphs 1-33, inclusive, of this Complaint.

35. Defendants deprived the Plaintiffs of privileges and opportunities provided White-owned businesses and White residents in the Township.

36. Defendants' actions harmed the ability of the Plaintiffs to use licenses, certifications, approvals and other permissions that properly had been issued to them or that they had obtained.

37. Defendants singled out the Plaintiffs for harassment.

38. Defendants treated the Plaintiffs differently from other similarly situated residents and businesses in the Township; Defendants' treatment was intentional; and there was no rational basis for the difference in treatment.

39. Defendants' actions violated the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution.

Count II – Due Process Clause violation

40. Plaintiffs incorporate herein by reference as if set forth in full the allegations of paragraphs 1-39, inclusive, of this Complaint.

41. Defendants' arbitrary and capricious actions deprived the Plaintiffs of their protected property interests.

42. Defendants' arbitrary and capricious actions impinged upon the Plaintiffs' use and intended use of the Property.

43. Defendants' actions were motivated by race discrimination and racial bias, and other conscience-shocking behavior, to wit:

a. Defendants treated the Plaintiffs differently and worse as compared to White residents and White-owned businesses in the Township;

b. Defendants' actions were intentionally injurious to the Plaintiffs and knowingly committed without justification; and

c. One of defendants' purposes was to negatively impact the Plaintiffs' ability to obtain the highest economic use of the Property.

44. The totality of the circumstances and actions described above shock the conscience.

45. Defendants' actions violated the Due Process Clause of the Fourteenth Amendment to the United States Constitution.

Count III – Abuse of Process

46. Plaintiffs incorporate herein by reference as if set forth in full the allegations of paragraphs 1-45, inclusive, of this Complaint.

47. Because defendants had no legitimate or actual public purpose in taking the Property through the Township's exercise of the power of eminent domain, defendant used the Pennsylvania Eminent Domain Code for an illegitimate, illegal, and improper purpose – to prevent the Plaintiffs from obtaining ownership of the Property and from obtaining the highest economic use of the Property solely because of Plaintiffs' race.

48. Defendants' abuse of process resulted in the Plaintiffs incurring the damages described herein.

Count IV – Tortious Interference With Contractual Relations

49. Plaintiffs incorporate herein by reference as if set forth in full the allegations of paragraphs 1-48, inclusive, of this Complaint.

50. Without any factual or legal justification, defendants intentionally interfered with the Plaintiffs' existing contractual relations with Mr. Damiani.

51. As a direct and proximate result of defendants' tortious interference with the Plaintiffs' existing contractual relations with Mr. Damiani, they incurred the damages described herein.

Jury Demand

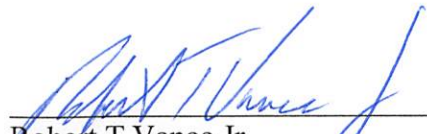
52. Plaintiffs demand a trial by jury.

Prayer for Relief

WHEREFORE, Plaintiffs, Billy Boy Real Estate, LLC, Billy Boy Construction, LLC, and Eddie Hendrick, hereby demand judgment in their favor and against the Defendants, jointly and severally, as follows:

- a. adjudging and declaring that the actions of the Defendants complained of herein violated their civil rights protected by the Equal Protection and Due Process Clauses of the Fourteenth Amendment to the United States Constitution and violated the common law;
- b. awarding them compensatory and punitive damages for the violation of their civil rights and Defendants' violation of the common law in amounts to be determined at trial;
- c. enjoining Defendants from taking any action against them that would violate their civil rights or the common law;
- d. awarding them attorney's fees, expert witness fees, costs and disbursements pursuant to 28 U.S.C. §1988; and

- e. awarding them such other and further relief as the Court deems proper.



Robert T Vance Jr
Law Offices of Robert T Vance Jr
123 South Broad Street, 15th Floor
Philadelphia PA 19109
267 887 0172 tel / 215 501 5380 fax
rvance@vancelf.com

Attorney for the Plaintiffs